



Testimony

to the Great Lakes and
St. Lawrence Cities Initiative's
Mayor's Commission
on Water Equity

Mayor Malik D. Evans,
City of Rochester, N.Y.



Lead is a cumulative toxic metal that even in low doses can cause a decrease in cognitive function, developmental delays, and behavioral problems in children. In higher doses, health impacts can be more severe for both children and pregnant women.

Lead in water service lines is the largest source of lead in drinking water, and lead service lines (LSLs) have a disproportionate impact on low-income and minority households. Approximately two-thirds of Rochester's LSLs are found in disadvantaged neighborhoods. It is our duty to remove and replace these public health hazards as quickly as possible.

City of Rochester neighborhoods currently have an estimated 23,400 public side (outside) and 4,500 private side (inside) water service lines that are composed of lead-containing materials. Full replacement of all LSLs in the City will be very costly, but the public health mandate to do so is unquestionable.

To achieve this goal, the City of Rochester has developed a plan to replace all LSLs by 2030. Our “Lead Free by 2030” initiative is a nine-year program designed to eradicate lead in Rochester’s water system.

The plan includes several approaches. Rochester Water Bureau routinely replaces about 300 lead service lines each year with its own repair crews as part of routine maintenance related to leaking water lines and curb stop valve replacements. Additionally, the City replaces all outside service lines that we encounter, whether lead or non-lead, during water main replacement projects.

In 2021, the City began a program to identify daycare facilities that are served by LSLs and has prioritized the replacement of those lines. To-date, the City has replaced LSLs at about 90 licensed daycares.

The Lead and Copper Rule Revisions enacted in December 2021 dictate that private-side water service lines composed of lead or galvanized pipe must be replaced in conjunction with the outside or public side of the service line. Inside lead and galvanized service replacements have been included in all projects since then.

All told, the City’s completed and planned Lead Service Line Replacements (LSLR) projects and related activities through 2023 will have removed approximately 5,000 LSLs from the City’s water distribution system.

This effort requires significant investment. Realistically, the City cannot generate the revenue required to replace all necessary lines without substantially raising costs to homeowners, businesses, not-for-profit organizations, and houses of worship – and that option is not feasible, as water bills would become unaffordable for many if the added cost of replacing lead service lines was added to their City-provided water service bills.

Instead, we have worked diligently to identify and prioritize funding sources to make a healthy water supply available to all.



LET'S GET THE LEAD OUT TOGETHER!
The City needs your help in finding the lead pipes in all of Rochester's homes by 2024.

STREET SIDEWALK HOUSE

WATER MAIN CURB STOP CURB BOX YOUR WATER SERVICE PIPE MET Owner's Shut-off Valve

Schedule an appointment for the City to ID your water service line by:
CALL: 585-428-7520 / TEXT: 585-866-9258
EMAIL: WATERENGINEERING@CITYOFROCHESTER.GOV

OR scan here to report it yourself from your phone

WANT A FREE LEAD TEST ON YOUR WATER?
Call: 585-428-6680 ext. 1
Email: watertest@cityofrochester.gov
Scan QR code for more information on how.

Malik D. Evans, Mayor
City of Rochester, NY • Rochester City Council

For instance, for private-side service line replacements where the outside lead service has already been replaced, the Water Bureau is working with the City's Department of Neighborhood and Business Development (NBD) to offer grant funding to homeowners.

For public-side replacements, the City is supplementing local monies with Federal funds allocated through the American Rescue Plan Act (ARPA) to make a portion of these replacements. We are also actively and aggressively seeking additional Federal funds from the Infrastructure Investment and Jobs Act/Bipartisan Infrastructure Law (IIJA/BIL) via New York State (NYS) to provide additional resources to accelerate and complete these replacements.

Looking back to 2018, the City began contracting dedicated LSLR projects that focused on public-side LSLs on streets that were scheduled for repaving, utilizing \$500,000 in City Water Capital Investment funds. A year later, a second group of streets scheduled for repaving were selected, with the work paid for by a \$538,000 NYS Department of Health (DOH) Grant.

In 2021, a much larger project was initiated on streets scheduled for repaving, funded by a \$660,000 NYS Environmental Facilities Corporation (EFC) grant along with \$490,000 of City Water Capital Improvement Program (CIP) funds. Also last year, LSLRs were

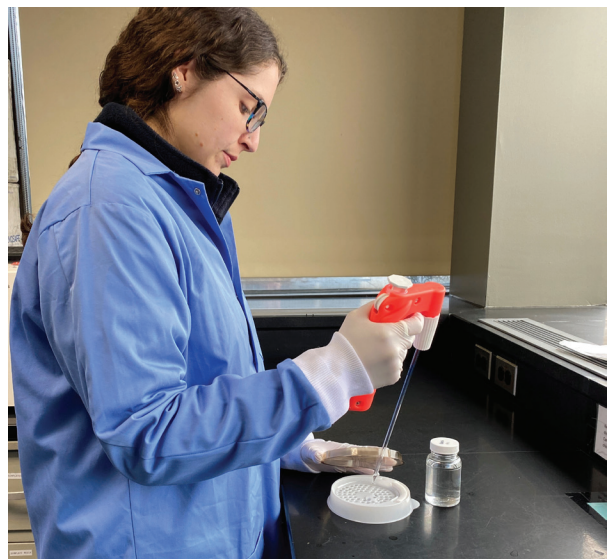
incorporated into the City's annual Water Main Cleaning and Lining Project, funded by \$920,000 from the City Water CIP for Water Main Renewal. A subsequent 2022 Water Main Cleaning and Lining Project also included LSL replacements, utilizing \$870,000 in CIP funding.

When Rochester was awarded \$202 million dollars in American Rescue Plan Act funds, City Council authorized \$3.6 million dollars for the Fall 2021 LSLR project as one of the very first projects to receive ARPA funding.

In 2022, the City committed an additional \$18 million in ARPA funds for two projects – one in the spring and one in the fall – to take full advantage of the limited construction season in our region. The spring project was just recently awarded and the fall project is going out to bid in September.

We recently received a notice from NYS EFC, awarding Rochester an additional \$3 million for the 2023 LSLR project, which will require a \$2 million match from our local funds. We have two other 2023 projects designed for which we are planning to utilize an additional \$15.75 million in ARPA funds.

We have been aggressive in dedicating available and discretionary funds to ensuring our water supply is lead-free. But even these significant investments are not enough to enable us to meet our goals for complete LSL removal by 2030. We will need additional financial help.





To optimize our investments and make the strongest case for additional Federal and NYS funds, the City has advanced an Optimal Corrosion Control Study (OCCS) and Intended Use Plan (IUP). The OCCS will allow the City to determine what water treatment will best reduce corrosion in the lead service lines supplying water to our residents while the City continues to identify funding to remove all LSLs in our system.

The City has submitted the Intended Use Plan (IUP) and associated project engineering report to the New York State Department of Health, along with a request for \$48.4 million dollars from the IJJA/BIL to fund five planned LSLR projects in 2024. If funded, the 2024 projects would result in nearly 5,400 additional full LSLRs, and the project engineering report demonstrates my commitment to equity by emphasizing replacements in our most disadvantaged neighborhoods.

The project engineering report was developed using a prioritization process that mapped the following factors to be used in selecting project locations:

- Environmental Justice using Disadvantaged Communities mapping as published in 2021 by New York State;
- Census tracts with large concentrations of Vulnerable Populations;
- Census tracts where child blood lead levels have exceeded 10 micrograms per deciliter; and
- Locations where lead tap sampling has exceeded 10 parts per billion.

In addition to these factors, consideration was made for LSL density and selection of streets where pavement restoration costs would be minimized to ensure efficiencies in construction and use of funds. We have taken great care to ensure that the project areas meet the requirements outlined in the IJJA/BIL.

The City has also been diligent in following the LSLR requirements included in the Lead and Copper Rule Revisions for all of these projects, including:

- Full LSL replacement (public and private side);
- Distribution of water pitchers with a lead removal filter;
- Whole service line flushing following replacement;
- Instructions to residents for whole house premise flushing;
- Free testing of customers' tap water for lead following replacement; and
- Information on post-LSLR procedures following replacements.

If fully funded by the NYSDOH, the 2024 project would result in approximately 12,300 remaining LSLs that would need to be replaced. The estimated cost for those remaining lines is approximately \$125 million dollars through 2029.

While the City has demonstrated its commitment to utilizing its own resources and leveraging state and federal funds that could be committed to any of dozens of other eligible uses, additional assistance from our Federal partners will be critical to eliminating the significant danger posed by lead in drinking water.

I provide my personal assurance that any additional funds provided to Rochester through Federal formula apportionments or discretionary programs will be money well-invested. Replacing LSLs is necessary to achieving my vision for a safe, equitable, and prosperous Rochester, and I stand ready to advocate for the funding to accomplish this in my City and those of my peers in the Great Lakes and St. Lawrence Region.



Mayor Malik D. Evans
City of Rochester, NY



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